

IN RE:	:	
OMER ALBERT HIGLEY	:	CASE NO. 1-19-00679-HWV
Debtor	:	
	:	
	:	CHAPTER 13
NEWREZ LLC d/b/a SHELLPOINT	:	
MORTGAGE SERVICING	:	
Movant	:	
	:	
v.	:	
	:	
OMER ALBERT HIGLEY	:	
Respondent	:	

AND NOW, comes Debtor, Omer Albert Higley, by and through his attorney, Gary J.

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. The Mortgage speaks for itself. Debtor has no

5. Admitted.
6. Admitted in part and denied in part. The loan documents speak for themselves. Strict is demanded.

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8. Admitted in part and denied in part. Debtor calculates that the arrearage owed through December 2020 is \$3,115.65. Debtor can pay the arrearage through November in certified funds prior to the hearing. Debtor offers to cure the remainder of the post-petition arrearage through a six (6) month Stipulation.

9. Admitted in part and denied in part. See response to paragraph 8.

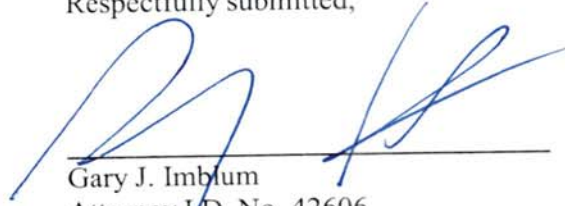
10. Denied. Debtor is providing adequate protection through post-petition payments. To the extent that the post-petition payments are in arrears, Debtor will make an offer in the near future to bring same current. Further, there is a significant equity cushion protecting the Movant. In particular, the property is worth \$174,550.00 in accordance with the market analysis attached to Debtor's Schedules. By its own admission, the unpaid principal balance owed to Movant is \$145,245.00. Accordingly, there is a significant equity cushion.

11. Admitted in part and denied in part. It is admitted that Movant is entitled to reasonable attorney's fees and costs.

12. Denied. Any and all fees and costs related to the Motion for Relief should be requested in this proceeding and approved by the Court.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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Attorney for Debtor

DATED: 12-31-20

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF NEWREZ LLC d/b/a SHELLPOINT MORTGAGE SERVICING FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J DEHART III ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

dehartstaff@pamd13trustee.com

REBECCA A. SOLARZ, ESQUIRE
KML LAW GROUP, P.C.
COUNSEL FOR MOVANT
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DATED: 12/31/2020